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Public Service Electric & Gas Company
File No.: D2008-00328

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:

SHAPES/ARCH HOLDINGS, L.L.C., et al.,

CHAPTER 11

Case No.: 08-14631 (GMB)

Debtors.

**NOTICE OF MOTION FOR ENTRY OF AN ORDER COMPELLING THE
DEBTORS TO PAY THE ADMINISTRATIVE CLAIM OF PUBLIC SERVICE
ELECTRIC AND GAS COMPANY AND FURTHER RELIEF AS MAY BE JUST
AND PROPER**

PLEASE TAKE NOTICE that Public Service Electric and Gas Company ("Public Service"), by its undersigned counsel will move this Court before the Honorable Gloria M. Burns, at US Bankruptcy Court, Camden, NJ on the 1st day of July, 2008 at 10 o'clock in the forenoon of that day, or as soon thereafter as counsel may be heard, for entry of an Order compelling payment by the Debtors of the administrative expense claim of Public Service for post-petition utility service provided by Public Service to the Debtors and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that Public Service shall rely on the application submitted herewith in support of the relief requested. A proposed form of Order is also submitted.

PLEASE TAKE FURTHER NOTICE that oral argument is requested only if opposition is filed.

PLEASE TAKE FURTHER NOTICE that any opposition to the motion of Public Service must be filed in writing with the Clerk of the United States Bankruptcy Court and served upon the undersigned counsel to Public Service so as to be received at least seven days prior to the hearing date pursuant to D.N.J. LBR9013-1(d). If no opposition is timely filed, the relief requested may be granted.

Dated: June 9, 2008

/s/Suzanne M. Klar
Suzanne M. Klar
Attorney for Public Service Electric
and Gas Company